

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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In re Bair Hugger Forced Air Warming  
Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

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This Document Relates to All Actions

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**DECLARATION OF GENEVIEVE M. ZIMMERMAN**

1. My name is Genevieve M. Zimmerman and I am a Partner with the Meshbesher & Spence Ltd. law firm. I am a member of the Court appointed Co-Lead Counsel in the above entitled matter.
2. Attached hereto as Exhibit 1 is a true and correct copy of portions of Timothy Ulatowski's deposition, taken on July 7, 2017 in Arlington, VA.
3. Attached hereto as Exhibit 2 is a true and correct copy of Timothy Ulatowski's Expert Report.
4. Attached hereto as Exhibit 3 is a true and correct copy of 3M internal document bearing bates range 3MBH00047439-42.
5. Attached hereto as Exhibit 4 is a true and correct copy of 3M internal document bearing bates range 3MBH01696526-27.
6. Attached hereto as Exhibit 5 is a true and correct copy of 3M internal document bearing bates range 3MBH0090030-31.

Dated: September 12, 2017

/s/ Genevieve M. Zimmerman

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